

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
-vs-)	CRIMINAL NO. 18-cr-20128
)	HON. STEPHEN J. MURPHY
CALEB YOUNG D-7)	
)	

EXPEDITED AMENDED MOTION FOR
TEMPORARY RELEASE TO ATTEND FUNERAL

Now comes Defendant, Caleb Young, (“Defendant”) by and through his attorney, Andrew D. Stacer, and moves this Honorable Court for its Order allowing him to be released from the Federal Courthouse, Eastern District of Michigan from Friday, October 19, 2018 at 5:00 p.m. until Monday, October 22, 2018 at 9:00 a.m. returning to the Federal Courthouse, Eastern District of Michigan. The purpose for said request is to allow Defendant to attend the burial, Visitation and Memorial Service of his only grandfather (his maternal grandfather passed away prior to Defendant’s birth) who passed away October 6, 2018. All of these are to occur on the date of October 20, 2018¹. Counsel for Defendant has contacted both the Assistant U.S. Attorney, Ms. Russo, and the U.S. Marshall regarding this matter.

Ms. Russo would not agree to a release on any temporary bond, but would not take any position regarding the U.S. Marshalls transporting while Defendant remains in custody. Contact with the U.S. Marshall’s office stated it would be an estimated \$1,800 - \$2,500 cost depending on terms of arrival, departure and day, with a 5-10 minute visit. Defendant has been in custody

¹ The original filing incorrectly listed October 30, 2018

since October 31, 2017² and is without funds to make this an option. Furthermore, Defendant's immediate family are unable to bear this cost. Finally, given the funerary services are out of the state of Michigan, this option is unlikely given the distance. Escort by the U.S. Marshal Service from Detroit, MI to Medina, OH while Defendant remains in custody would involve much more complicated arrangements and would not permit Defendant to attend the memorial and visitation. Therefore, we respectfully opine that the most practical way to allow Defendant to participate in burial, visitation and memorial of the only grandfather he has ever known is the temporary release requested herein

WHEREFORE, Defendant prays that this Honorable Court enter an allowing him to be released from custody from Friday, October 19, 2018 at 5:00 p.m. until Monday, October 22, 2018 at 9:00 a.m. returning to the Federal Courthouse, Eastern District of Michigan. Defendant is willing to submit and accept any additional conditions which the court might deem appropriate in granting this request, including but not limited to appointment of Dawn Young, his sister who is a member of the U.S. armed forces, as a third party custodian who will be responsible for the Defendant while on temporary release and/or wearing a GPS tether and/or posting of a temporary bond.

Respectfully submitted,

/s Andrew D. Stacer
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Plymouth, MI 48170
(734) 453-7878
E-mail: astacer@stacerplc.com
P 55717

Dated: October 17, 2018

² The original filing incorrectly listed October 31, 2018.

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CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

Respectfully submitted,

/s Andrew D. Stacer
472 Starkweather St.
Plymouth, MI 48170
(734) 453-7878
E-mail: astacer@stacerplc.com
P 55717

Dated: October 17, 2018